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September 1, 2021

MEMO ENDORSED

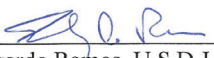
VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Elvin German*
21 Cr. 245 (ER)

Dear Judge Ramos:

The request is GRANTED. The September 10, 2021 conference is adjourned to October 5, 2021 at 3:30pm. The request to exclude speedy trial time until October 5, 2021 is GRANTED. It is SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 9/2/2021
New York, New York

Please recall that I represent Mr. Elvin German in his defense of the above-referenced matter. Mr. German is presently scheduled to appear before Your Honor on September 10, 2021 at 10:00 a.m. for a pretrial conference. For the reasons that follow, I write to respectfully request that Your Honor grant a 30-day adjournment of the pretrial conference. This is the defense's third adjournment request in this matter. I have conferred with A.U.S.A. Danielle Kudla, and the Government consents to this request.

As Your Honor is aware, the parties have been engaging in good faith negotiations towards a possible resolution of this matter, and this past Saturday, August 28, 2021, the Government provided the defense with a proposed plea agreement. The requested adjournment is necessary to enable me to thoroughly review the proposed plea agreement with Mr. German and to possibly further negotiate the offer.

Therefore, I write to respectfully request that Your Honor grant a 30-day adjournment of the pretrial conference in the above-captioned matter. The parties respectfully request that the Court schedule a status conference for the week of October 4, 2021, or a date convenient to the Court thereafter, and if the parties come to an agreement beforehand, we will notify Chambers to seek a change of plea hearing date.¹ The defense has no objection to the exclusion of time under the Speedy Trial Act. Thank you for your consideration.

Respectfully submitted,


Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Danielle Kudla (via ECF)
Mr. Elvin German (via email)

¹ I am unavailable to appear from October 6 through October 13, 2021 for personal reasons.